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Massachusetts Mutual Life Insurance  
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10 UNITED STATES DISTRICT COURT

11 EASTERN DISTRICT OF CALIFORNIA

12 JOHN C. ROBINSON,

No.: CIV. S-04-1684 DFL KJM

13 Plaintiff,

14 VS.  
**STIPULATION AND [PROPOSED]  
ORDER CONTINUING DATES SET IN  
STATUS (PRE-TRIAL SCHEDULING)  
ORDER**

15 MASSACHUSETTS MUTUAL LIFE  
16 INSURANCE COMPANY, SUCCESSOR IN  
INTEREST TO CONNECTICUT MUTUAL  
17 LIFE INSURANCE COMPANY, and DOES 1  
through 20, inclusive,

18 Defendants.

19  
20 IT IS HEREBY STIPULATED by and between the parties hereto, through their  
21 respective attorneys of record, as follows:

22 1. The Court's Status (Pre-trial Scheduling) Order dated October 25, 2004, set  
23 the following dates:

- 24 a. Discovery cut-off date: April 29, 2005;  
25 b. Last day to file dispositive motions: June 1, 2005;  
26 c. Hearing on dispositive motions: July 13, 2005, 10:00 a.m.;  
27 d. Final pre-trial conference: August 26, 2005, 3:00 p.m., with joint pretrial

28 statement due no later than seven days before the conference; and

1 e. Trial date: October 3, 2005, 9:00 a.m.

2 2. The parties respectfully request that the Court issue an order extending these  
3 deadlines so the parties have time to complete a mediation before incurring the expense of  
4 completing all fact and expert discovery, as follows:

5 a. Discovery cut-off date: July 28, 2005;

6 b. Last day to file dispositive motions: September 7, 2005;

7 c. Hearing on dispositive motions: October 5, 2005, 10:00 a.m.;

8 d. Final pre-trial conference: November 16, 2005, 4:00 p.m., with joint  
9 pretrial statement due no later than seven days before the conference; and

10 e. Trial date: December 12, 2005, 9:00 a.m.

11 3. The parties have not made any previous request for an extension of  
12 time for these dates.

13 DATED: May 2, 2005

14 REED SMITH LLP

15 By //s//

16 Linda B. Oliver  
17 Attorneys for Defendant Massachusetts Mutual  
Life Insurance Company

18 DATED: May 2, 2005

19 LAW OFFICE OF JOHN M. RIESTENBERG

21 By //s//

22 John M. Riestenberg  
Attorneys for Plaintiff John C. Robinson

23 IT IS SO ORDERED.

24 Dated: 5/3/2005

25 /s/ David F. Levi

26 DAVID F. LEVI  
United States District Judge